

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC

Petitioner/Judgment Creditor,

v.

Civil Action No.: 14-FJ-05-HE

AVON CAPITAL, LLC,

Respondent/Judgment Debtor,

ASSET SERVICING GROUP, LLC,

Respondent/Garnishee,

SDM HOLDINGS, LLC,

Respondent/Garnishee,

and

AVON CAPITAL, LLC, a Wyoming
Limited liability company.

Intervenor.

MOTION FOR CONTINUANCE

Petitioner/Judgment Creditor, Universitas Education, LLC (“Universitas”), hereby submits the following Motion for Continuance (“Motion”). In support of this Motion, Universitas respectfully shows the Court as follows:

1. On April 27, 2021, Universitas filed its Motion for Hearing on Assets [Doc. 252].
2. On May 4, 2021, the Court entered an Order granting Universitas’s Motion for Hearing on Assets [Doc. 258], setting the asset hearing for May 13, 2021 at 10:30 a.m., and commanding Respondent/Judgment Debtor, Avon Capital, LLC (“Avon”), and Respondent/Garnishee, SDM Holdings, LLC (“SDM”), to appear at the same.

3. On April 29, 2021, Universitas filed its Notice of Subpoena [Doc. 255] with respect to a Subpoena to Produce Documents (“Subpoena”) issued to Asset Servicing Group, LLC (“ASG”).
4. Said Subpoena commands ASG to produce certain documents to counsel for Universitas on May 14, 2021. *See*, Doc. 255-1.
5. The documents sought by Universitas via the Subpoena are needed by Universitas to prepare for the hearing on assets presently set for May 13, 2021.
6. As the documents sought from ASG will not be produced prior to the date presently set for the hearing on assets, Universitas respectfully requests the Court continue the hearing on assets to a date no earlier than May 17, 2021.
7. Universitas has previously requested four continuances and/or extensions of time in this matter [Docs. 28, 108, 110, 119], all of which were unopposed and were subsequently granted by the Court.
8. Continuance of the hearing on assets will not impact any other deadlines in this matter.
9. Counsel for Universitas contacted counsel for Avon and SDM to determine whether either party objects to the granting of this Motion. At the time of filing this Motion, counsel for Avon and SDM had yet to respond.

WHEREFORE, for the reasons set forth above, Universitas respectfully requests this Court continue the hearing on assets presently set for May 13, 2021, to a date no earlier than May 17, 2021, and for all other relief this Court deems just and equitable.

DATED this 5th day of May, 2021.

/s/ Timothy F. Campbell
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ATTORNEYS FOR UNIVERSITAS
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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner
Joseph H. Bocock
Alan Rupe
Gerald Green Melvin McVay
Clayton Ketter
Jeffrey Sandberg

/s/ Timothy F. Campbell